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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BARRY MICHAELS,
Plaintiff,

v.

LORETTA E. LYNCH, Attorney General of the
United States, in her official capacity; and
THOMAS E. BRANDON, Deputy Director,
Bureau of Alcohol, Tobacco, Firearms &
Explosives, in his official capacity,

Defendants.

Case No: 2:16-cv-00578-JAD-PAL

**DEFENDANTS' UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendants hereby move for an extension of time up to and including July 25, 2016 in which to respond to the complaint in this case. The current deadline is June 24, 2016. Plaintiffs' counsel has consented to the extension of time. In support of this motion, Defendants state as follows:

Defendants requires additional time because counsel for Defendants was recently assigned to this case, and because of the press of business and scheduling conflicts, including an evidentiary hearing later this month. This motion is not sought merely for delay but in order that justice may be served.

1 Based on the foregoing, Defendants respectfully request that their unopposed motion for an
2 extension of time be granted.

3 Respectfully submitted this 17th day of June 2016.

4 JOHN R. TYLER
5 Assistant Branch Director, Federal Programs
6 Branch

7 /s/ Daniel Riess
8 DANIEL RIESS
9 Trial Attorney

10 IT IS SO ORDERED:

11 UNITED STATES DISTRICT JUDGE
12 UNITED STATES MAGISTRATE JUDGE

13 DATED: _____
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PROOF OF SERVICE

I hereby certify that this **UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT** was served this date on all parties via electronic mail at the following address:

Michael E. Zapin
Law Offices of Michael E. Zapin
20283 State Rd 7, Ste. 400
Boca Raton, Florida 33498
michaelezapin@gmail.com
Counsel for Plaintiff

Dated this 17th day of June 2016.

/s/ Daniel Riess
DANIEL RIESS
Trial Attorney

fedex.com 1.800.GoFedEx 1.800.463.3339

00252

00109

FedEx Package
Express US AirbillTracking
Number

8063 2263 1877

1 From

Date June 17, 2016

Sender's Name John Tyler

Phone 202 644-3474

Company USDOJ/DOJ/FEDERAL PROGRAMS

Address 20 MASSACHUSETTS AVE NW

Dept./Room/Room

City WASHINGTON

State DC

ZIP 20530-0001

2 Your Internal Billing Reference

3 To

Recipient's Name Clerk's Office

Phone 702 464-5400

Company US District Court, Dist of Nevada

Address 333 Las Vegas Blvd

Dept./Room/Room

Address Lloyd D George US Courthouse

Use this line for ADDITIONAL location address or for continuation of your shipping address.

City Las Vegas

State NV

ZIP 89101



8063 2263 1877

0115998908

Form
ID No. 0215

Recipient's Copy

4 Express Package Service

NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 20 lbs., use the
FedEx Express Freight US Airbill.

Next Business Day

☐ FedEx First Overnight

Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☒ FedEx Priority Overnight

Next business morning. * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx Standard Overnight

Next business afternoon. * Saturday Delivery NOT available.

2 or 3 Business Days

☐ FedEx 2Day A.M.

Second business morning. * Saturday Delivery NOT available.

☐ FedEx 2Day

Second business afternoon. * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx Express Saver

Third business day. * Saturday Delivery NOT available.

5 Packaging

* Indicated within limit box.

☒ FedEx Envelope*☐ FedEx Pak*☐ FedEx Box☐ FedEx Tube☐ Other

6 Special Handling and Delivery Signature Options

☐ SATURDAY Delivery

NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

☐ No Signature Required

Package may be left without obtaining a signature for delivery.

☐ Direct Signature

Signature at recipient's address may sign for delivery. * Fee applies.

☐ Does this shipment contain dangerous goods?

One box must be checked.

☐ No☐ Yes

See per attached shipping label.

☐ Yes

Shipped in accordance with Department of Transportation regulations.

☐ Dry Ice

Dry Ice 5, UN1845

☐ Cargo Aircraft Only

7 Payment Bill to:

Sender's Account

Recipient

Third Party

Credit Card

Cash/Check

Obtain recip.

Acct. No.

Total Packages

Total Weight

lbs.

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